

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

PATRICIA LOWRY, individually and on	)	
behalf of all others similarly situated,	)	
	)	
Plaintiff,	)	
	)	
v.	)	
	)	No.: 20-cv-01939
RTI SURGICAL HOLDINGS, INC.,	)	Honorable Matthew F. Kennelly
CAMILLE I. FARHAT, BRIAN K.	)	
HUTCHISON, JONATHON M. SINGER,	)	
ROBERT P. JORDHEIM, and JOHANNES	)	
W. LOUW,	)	
	)	
Defendants.	)	

**JOINT STATUS REPORT**

Lead Plaintiff Rosy Yeretsian and Defendants RTI Surgical Holdings, Inc., Camille I. Farhat, Brian K. Hutchison, Robert P. Jordheim, Johannes W. Louw, and Jonathon M. Singer (collectively, “the Parties”), by their respective undersigned counsel, submit this Joint Status Report pursuant to this Court’s orders of April 1, 2021 [Doc. No. 78] and April 22, 2021 [Doc. No. 80] in the above-captioned mater (the “Action”):

**I. INITIAL RULE 26(F) CONFERENCE**

The Parties conducted an initial conference under Fed. R. Civ. P. 26(f) via telephone on April 15, 2021 and engaged in follow-up discussions on April 21, 2021, also telephonically. Counsel for each party participated in the conference.

**II. PROPOSALS FOR CASE SCHEDULE**

The Parties met and conferred and have agreed to a mediation of the Action on June 30, 2021 with mediator, Michelle Yoshida. In advance of the mediation, the Parties have agreed to – and now propose – the following:

- The Parties shall exchange Rule 26(a) disclosures on May 19, 2021;
- The Parties shall enter into a confidentiality/protective order governing discovery in the Action, or submit disputes to the Court, by June 2, 2021;
- The Parties shall agree on ESI terms and initial custodians, or submit disputes to the Court, by June 2, 2021; and
- If the mediation is unsuccessful, the Parties shall prepare a proposed joint discovery and pretrial schedule by July 9, 2021 for the Court's approval, or separate schedules if the Parties are unable to agree on a proposed joint discovery schedule.

### **III. DERIVATIVE ACTIONS**

In its April 1, 2021 order, the Court asked whether related cases Nos. 20 C 3347, 20 C 3464, and 20 C 3953 should be dismissed. These related cases are shareholder derivative actions filed by Summers, Campbell, and DeFilippis respectively (the "Derivative Litigation"). The Derivative Litigation was stayed pending resolution of the motions to dismiss filed in the Action. Because there is no overlap between Lead Plaintiff and Co-Lead Counsel in the Action, on the one hand, and the derivative plaintiffs and derivative plaintiffs' counsel in the Derivative Litigation, on the other hand, the Parties suggest that the Derivative Litigation be the subject of a separate joint status report and/or status call.

### **IV. OTHER ISSUES TO DISCUSS AT MAY 3, 2021 HEARING**

None.

Dated: April 29, 2021

Respectfully submitted,

**For Lead Plaintiff Rosy Yeretsian:**

**For Defendants RTI Surgical Holdings, Inc.,  
Camille I. Farhat, and Jonathon M. Singer:**

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